

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11 Case No.
) 22-10964 (MG)(Jointly
) Administered)
CELSIUS NETWORK LLC, <i>et al.</i> ¹)
)
Debtors.)
)

**JOINDER OF IBERTRADE REPRESENTACIONES SL IN SUPPORT OF
MOTION SEEKING ENTRY OF AN ORDER**

**(I) APPROVING FURTHER DISTRIBUTION UNDER PLAN OF
REORGANIZATION FOR CORPORATE CREDITORS AND (II) GRANTING
RELATED RELIEF**

TO: THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

Teresa Gonzalez Sainz, on behalf of Ibertrade Representaciones SL, hereby join the Motion Seeking Entry of An Order (I) Approving Further Distributions Under Plan of Reorganization For certain Corporate Creditors, and (II) Granting Related Relief [ECF No. 4911] (the “Motion”). In support of their Joinder, which states as follows:

STATEMENT

¹ The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Post-Effective Date Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

1. On January 31, 2024, the Post-Effective Date Debtors emerged from chapter 11 and commenced distributions under the Modified Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates (Conformed for MiningCo Transaction), dated January 29, 2024 (Docket #4289) (hereinafter referred to as the “Plan”). The language of the Plan provides that distributions were to be made as soon as possible after January 31. However, distributions were not made timely to IBERTRADE REPRESENTACIONES SL, as no distribution has been made at all. It is now 128 days after January 31, the date of Debtors’ emergence. IBERTRADE REPRESENTACIONES SL has claim no. 3.1.225306. Using a similar calculation to that used by the Faller Creditors, IBERTRADE REPRESENTACIONES SL has been damaged in the sum of **\$20,474.36** (calculations shown in the table below). By this Joinder, IBERTRADE REPRESENTACIONES SL seeks additional compensation in the sum of **\$20,474.36** from the bankruptcy estate to be made whole under the Plan.

Claimant	Claim Value	Distribution Received Date	BTC Price on Distribution Received Date	ETH Price on Distribution Received Date	Fiat Value of BTC using Distribution Prices	Fiat Value of ETH using Distribution Prices	Total	Total With Interest ¹	Distribution Received	Shortfall
IBERTRADE REPRESENTACIONES SL	\$21,844.73	06/07/2024	\$71,257.25	\$3,815.36	\$11,047.91	\$8,860.09	\$19,908.00	\$20,474.36	\$0.00	\$20,474.36

1.) Interest based on www.irs.gov/payments/quarterly-interest-rates

June 7th, 2024

Respectfully submitted

Maria Teresa Gonzalez Sainz,
Company Administrator
IBERTRADE REPRESENTACIONES SL